

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	

**REPLY COMMENTS OF THE CELLULAR TELECOMMUNICATIONS &
INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association (“CTIA”)¹ hereby replies to the comments filed on November 6, 2001, regarding the Commission’s *Public Notice* on the proposed national thousands-block number pooling (“pooling” or “TBNP”) rollout schedule.² As CTIA stated in its comments, the wireless industry intends to be ready by November 24, 2002, to support pooling in all numbering plan areas identified by the National Thousands-Block Number Pooling Administrator (“Pooling Administrator”).

The comments filed by wireline carriers express concern that the Commission’s proposed rollout schedule may overwhelm the resources of carriers, state commissions, the North American Numbering Plan Administrator, and the Pooling Administrator.³ The

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

² See *Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, Public Notice (rel. Oct. 17, 2001) (“Public Notice”).

³ See Bellsouth Comments at ii; SBC Communications Inc. Comments (“SBC Comments”) at 2; Worldcom Comments. See also The United States Telecom

wireline industry has been participating in interim pooling since 1998; accordingly, these comments offer a unique appreciation for the workload capacity and impact of pooling to the Public Switched Telephone Network (“PSTN”). CTIA agrees with BellSouth that “nationwide pooling is a massive undertaking.”⁴

CTIA appreciates the concerns raised by SBC regarding the simultaneous implementation of wireless pooling and porting. SBC reminds the Commission that “year 2002 activities will impact the same SBC resources,” including wireless pooling testing, wireless porting, and wireless pooling which begins on a flash-cut basis.⁵ As a result of not having enough resources to perform these work activities, “customer service outages due to service order errors” could occur and general administrative problems will arise due to lack of staff resources.⁶ SBC warns that the flash-cut implementation of wireless porting and pooling will slow down the network response to service providers,⁷ and as a result, “service providers could be compelled to take systems off line, could experience missing updates, and similar problems.”⁸

CTIA concurs that the “degree of impact [to the PSTN] is unknown at this time.”⁹ SBC is troubled by this “unknown” since “history has shown that when the data increases

Association (“USTA”) Comments at 3 (stating that the “implementation of [the pooling] schedule is unrealistic and unmanageable”).

⁴ BellSouth Comments at 4.

⁵ SBC Comments at 5.

⁶ SBC Comments at 5.

⁷ See SBC Comments at 3-7.

⁸ SBC Comments at 7.

⁹ SBC Comments at 7.

and service providers do not have the capability to ‘catch’ the data in a faster manner, problems arise.”¹⁰ CMRS carriers have made some general conclusions about the impacts of pooling on wireless networks, based upon the pooling volume forecasts anticipated for next year. A CTIA draft report addressing pooling readiness concludes that 19,200 Thousands Blocks must be identified and donated to the pools, and that wireless carriers undoubtedly will require Thousands Blocks for all of the more than 160 NPAs involved in pooling, adding to the complexity and challenges facing carriers and NeuStar.

CTIA urges the Commission to be sensitive to network integrity concerns as the wireline and wireless industries work together to implement TBNP. CTIA agrees with the California Public Utilities Commission (“CPUC”) that the pooling burdens placed on carriers “could result in problems that might affect service quality, or even call completion.”¹¹ While the CPUC comments only focused on the impact of pooling, the Commission also should be mindful of the cumulative impact of simultaneously implementing both the pooling and the porting mandates on wireless carriers.¹² The FCC should heed the concerns expressed by the wireline carriers and the CPUC, based on their actual experience and understanding of the complexities associated with turning up TBNP in a single numbering plan area (“NPA”).

¹⁰ SBC Comments at 7.

¹¹ California Public Utilities Commission Comments (“CPUC Comments”) at 2.

¹² With respect to wireless number portability, CTIA continues to believe that if the Verizon Wireless Petition for Forbearance is not granted, the Commission must, at a minimum, provide a transition period between the pooling and porting deadlines.

In their comments, the wireline carriers oppose the Commission's proposed schedule because it requires the rollout of pooling to more than three NPAs per quarter, claiming that the schedule "is overly aggressive and poses an increased risk to carrier networks and service reliability without significant countervailing benefits."¹³ While CTIA agrees that the pooling rollout schedule is aggressive, it believes that the wireless industry will be prepared to meet the LNP mandate. CTIA recognizes that CMRS participation in TBNP will pose significant challenges for the industry;¹⁴ however, the potential benefits of TBNP, namely the conservation of numbers within the North American Numbering Plan and the provision of additional numbering resources to

¹³ BellSouth Comments at i. *See* BellSouth Comments at 2-3 ("This approach [more than three NPAs per quarter in the Commission's proposed schedule] completely undermines the Commission's prior concerns for protecting the integrity and reliability of the PSTN"); SBC Comments at 5 (The Proposed Schedule, which requires rolling out more than three NPAs per NPAC region per quarter, will adversely impact SBC's work force and systems."); WorldCom Comments at 2 ("If the rollout is too burdensome, the risk of errors harmful to network reliability will rise."); USTA Comments at 2 (The Commission adopted the policy to limit TBNP rollout to three NPAs per quarter because "carriers need the time afforded by that schedule to upgrade or replace their Service Control Points ("SCPs") and other components of their networks so that possible overload of the network and resultant network disruptions would be avoided.").

¹⁴ As CTIA has explained previously, CMRS participation in TBNP, which involves over 160 NPAs, requires wireless carriers to implement the Location Routing Number ("LRN"), separate the Mobile Identification Number ("MIN") from the Mobile Directory Number ("MDN"), and complete other upgrades to their networks to be pooling capable. In addition to the NPAs listed in the pooling schedule, the wireless industry must transition NPAs that are currently participating in pooling trials to the pooling schedule. *See* CTIA's Comments on Wireless LNP Forbearance Petition Filed by Verizon Wireless, WT Docket No. 01-184 (Sept. 21, 2001) ("CTIA's Comments"); CTIA's Reply Comments on Wireless LNP Forbearance Petition Filed by Verizon Wireless, WT Docket No. 01-184 (Oct. 22, 2001) ("CTIA's Reply Comments").

wireless carriers necessitated by their continuing growth¹⁵ are substantial for the industry and consumer.

More than one wireline carrier advocates an extension or delay of the national rollout because it “cannot possibly satisfy this proposed milestone schedule based on the Commission’s tentative deadlines.”¹⁶ CTIA does not seek a delay in the pooling rollout but looks forward to working with the wireline industry to better understand this rationale in order to achieve successful implementation. Given the industry’s unequivocal need for numbering resources, wireless carriers are eager to meet the Commission’s TBNP mandate.¹⁷

As CTIA urged in its Petition seeking reconsideration of the *Second Report and Order* in this docket, the Commission should carefully consider the impact on network integrity triggered by its separate decisions, made two years apart in two separate dockets

¹⁵ Overall wireless subscribership increased 22 percent, from 97 million in June 2000, to 118.4 million as of June 2001. Every two seconds, a new subscriber signs up for wireless service in the U.S. See Nov. 15, 2001 CTIA Press Release, Wireless Industry Survey: More People Talking, More Often.

¹⁶ See BellSouth Comments at 7, 8 (BellSouth proposes that “the Commission consider a modest extension of the national rollout”); Cincinnati Bell Telephone Company Comments at 5-6 (“recommends that the Commission adjust the final pooling schedule to give all carriers at least six months advance notice”); Verizon at 3 (the proposed first quarter schedule should be altered from 90 days to 120 days between the first implementation meeting and the pooling start date); SBC Comments at 3 (requesting an extension to adhere to 3 NPAs per quarter that “will change from a total of eight quarters for all NPAs listed to a total of ten quarters for those NPAs that are associated with Top 100 MSAs.”)

¹⁷ CTIA is encouraged by the Idaho Public Utilities Commission Comments which underscore that “number conservation measures will not be used to the exclusion of, or as a substitute for, timely area code relief” and that it “understands its obligation to implement area code relief in a timely fashion.” This cooperative spirit will lead to the successful deployment of thousands-block number pooling.

for two separate reasons, to mandate the simultaneous nationwide implementation of both CMRS number pooling and CMRS number porting. In addition, the Commission should maintain its authority over the national rollout schedule for pooling so it can prevent, or at least minimize, further complications to the pooling rollout and avoid jeopardizing the successful deployment of TBNP. Finally, the wireless industry remains firmly committed to participating in number pooling by the November 24, 2002 deadline.

Respectfully submitted,

/s/ _____

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